

1 **TENORIO\_A.3dep**

2 **LEONARDO M. RAPADAS**

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8  
9 IN THE UNITED STATES DISTRICT COURT

10 FOR THE DISTRICT OF GUAM

11 UNITED STATES OF AMERICA, )

CRIMINAL CASE NO. 96-00082

12 Plaintiff, )

13 vs. )

NOTICE OF INTENTION TO TAKE  
THIRD PARTY ORAL DEPOSITION  
WITH SUBPOENA DUCES TECUM

14 ANDREW MENDIOLA Q. TENORIO, )  
aka ANDREW QUIDACHAY, )

15 Defendant. )  
16 \_\_\_\_\_ )

17 TO: Remedios Quidachay

P.O. Box XXXXX

18 GMF, Guam 96921

19 Please take notice that the United States of America, the plaintiff and judgment  
20 creditor herein, will on May 8, 2008 take third party oral deposition of Remedios Quidachay, in  
21 the above styled and number case pursuant to Rules 30 and 69(a) of the Federal Rules of Civil  
22 Procedure and in aid of collecting its judgment.

23 Said third party deposition will take place at the offices of the United States Attorney, 5<sup>th</sup>  
24 Floor, Sirena Plaza, 108 Hernan Cortez Avenue, Hagåtña, Guam at 3:00 p.m. on May 8, 2008  
25 and will continue until completed. Said deposition will be taken before a Certified Court  
26 Reporter and will be taken upon oral examination for the purpose of discovery or as evidence or  
27 both pursuant to the Federal Rules of Civil Procedure.

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1 Notice is hereby further given that at this deposition, Remedios Quidachay, is hereby  
2 required to produce all documents described in the accompanying Schedule A.

3 DATED, this 19<sup>th</sup> day of February, 2008.

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5 LEONARDO M. RAPADAS  
United States Attorney  
6 Districts of Guam and the NMI

7  
8 By: /s/ Jessica F. Cruz  
JESSICA F. CRUZ  
Assistant U.S. Attorney  
9 Jessica.F.Cruz@usdoj.gov  
MIKEL W. SCHWAB  
10 Assistant U.S. Attorney  
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SCHEDULE A TO NOTICE OF INTENT TO TAKE  
THIRD PARTY ORAL DEPOSITION WITH SUBPOENA DUCES TECUM

1. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where any sole proprietorship, partnership or corporation in which you are joint with Andrew Mendiola Q. Tenorio aka Andrew Quidachay and owns any interest.
2. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions where you, joint with Andrew Mendiola Q. Tenorio aka Andrew Quidachay, have an account of any kind, including but not limited too, time certificate of deposits.
3. All trust agreements in which you, joint with Andrew Mendiola Q. Tenorio aka Andrew Quidachay, are named settlor, trustee, or beneficiary.
4. All deeds, leases, contracts, and other documents evidencing encumbrances of any kind on real property owned jointly with Andrew Mendiola Q. Tenorio aka Andrew Quidachay.
5. All deeds of trusts, mortgages, or other documents evidencing encumbrances of any kind on real property owned jointly with Andrew Mendiola Q. Tenorio aka Andrew Quidachay in which you, joint with Andrew Mendiola Q. Tenorio aka Andrew Quidachay, have any ownership interest.
6. A listing of all stock, bonds, or other securities of any class you own jointly with Andrew Mendiola Q. Tenorio aka Andrew Quidachay, including options to purchase any securities and the actual instruments if in your possession.
7. Current brokerage statements for the past twelve (12) months from any stock brokerage firm or similar entity where you, joint with Andrew Mendiola Q. Tenorio aka Andrew Quidachay, have an account of any kind.
8. Title to any motor vehicle jointly owned with Andrew Mendiola Q. Tenorio aka Andrew Quidachay.
9. All life insurance policies held by you in which Andrew Mendiola Q. Tenorio aka Andrew Quidachay is either the insured or the beneficiary.
10. All promissory notes held by you, and all other documents evidencing any money owed to you, jointly with Andrew Mendiola Q. Tenorio aka Andrew Quidachay, either now or in the future.
11. All deeds, titles, bills of sale, or other documents prepared in connection with any transfer of real or personal property made with you to Andrew Mendiola Q. Tenorio aka Andrew Quidachay or jointly with Andrew Mendiola Q. Tenorio aka Andrew Quidachay, either by gift, sale, or otherwise.
12. All documents evidencing any interest you have with Andrew Mendiola Q. Tenorio aka Andrew Quidachay in any pension plan, retirement fund, or profit sharing plan.